

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 11 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
JAIME L. SEPULVEDA-TORO, M.D. FOR WAVE 11**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Jaime L. Sepulveda-Toro for Ethicon Wave 1, Dkt. 2014 (motion), Dkt. 2018 (memorandum in support) and Dkt. 2225 (reply).

Plaintiffs respectfully request that the Court exclude Jaime L. Sepulveda-Toro's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 11 cases identified in Exhibit A attached hereto.

Dated: August 7, 2019

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

**EXHIBIT A**

Anthony, Deanna	2:12-cv-06831
Bailey, Diane Michelle	2:14-cv-03875
Cox, Blake	2:12-cv-06096
Crissman, Andrea & Randall	2:13-cv-01319
Davis, Kimberly Anne	2:14-cv-22126
Delk, Jena M. & Michael L.	2:13-cv-32501
Geery, Michelle A.	2:14-cv-09072
Gonzalez, Diana	2:13-cv-26548
Graham, Tammy	2:12-cv-06054
Kress, Eileen	2:14-cv-19292
Mason, Lisa	2:13-cv-07175
Meindertsma, Jeanne & Bruce	2:13-cv-23903
Morris, Michelle Lee & Scottie J.	2:13-cv-13594
Mortimer, Victoria	2:13-cv-03046
Munsee, Lanell & Blain	2:13-cv-26868
Russell, Mellissia & Greg	2:16-cv-02730
Sellers, Dina M. & Leon	2:13-cv-25344
Shea-Towers, Deborah & Brian	2:13-cv-01540
Shostrom, Leah R.	2:13-cv-15857
Simmons, Phyllis S.	2:14-cv-00839
Sotolongo, Yolanda Rey	2:18-cv-00242
Zemanovic, Nancy	2:18-cv-01030

**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
D. Renee Baggett  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)